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*Counsel to the Debtors  
and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**NOTICE OF FILING OF DECLARATION OF MICHAEL GOULBORN  
ON BEHALF OF MJM LIMITED IN ACCORDANCE WITH  
THE ORDER AUTHORIZING THE DEBTORS TO RETAIN AND COMPENSATE  
CERTAIN PROFESSIONALS UTILIZED IN THE ORDINARY COURSE OF BUSINESS**

**PLEASE TAKE NOTICE** that, on January 19, 2023 (the "Petition Date"), Genesis Global Holdco, LLC ("Holdco") and certain of its debtor affiliates, as debtors and debtors-in-possession in the above captioned chapter 11 cases (collectively, the "Debtors"), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (the "Bankruptcy Code") with the United States Bankruptcy Court for the Southern District of New York (the "Court").

**PLEASE TAKE FURTHER NOTICE** that, on February 8, 2023, the Debtors filed *Debtors' Motion for Authority to Employ Professionals Used in the Ordinary Course of Business Nunc Pro Tunc to the Petition Date*, ECF No. 65 (the "OCP Motion").

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

**PLEASE TAKE FURTHER NOTICE** that, on February 24, 2023, the Court entered the *Order Authorizing the Debtors to Retain and Compensate Certain Professionals Utilized in the Ordinary Course of Business*, ECF No. 102 (the “OCP Order”).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the OCP Order, attached hereto as **Exhibit A** and **Exhibit B** are the OCP Declaration<sup>2</sup> and OCP Questionnaire, respectively, of Michael Goulborn on behalf of MJM Limited.

Dated: July 10, 2023  
New York, New York

/s/ Luke A. Barefoot  
Sean A. O’Neal  
Luke A. Barefoot  
Jane VanLare  
CLEARY GOTTlieb STEEN & HAMILTON  
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*Counsel to the Debtors and  
Debtors-in-Possession*

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the OCP Motion.

**EXHIBIT A**  
**OCP Declaration**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**DECLARATION OF DISINTERESTEDNESS**

I, **MICHAEL GOULBORN**, declare that the following is true to the best of my knowledge, information and belief:

1. I am a Senior Associate of MJM Limited, located at Thistle House, 4 Burnaby Street, Hamilton HM 11, Bermuda (the “Firm”), which has been employed by the debtors and debtors in possession (the “Debtors”) in the above-captioned cases (the “Chapter 11 Cases”) in the ordinary course of the Debtors’ business. The Debtors wish to retain the Firm to provide ordinary course services during the Chapter 11 Cases, and the Firm has consented to provide such services. This Declaration is submitted in compliance with the *Order Authorizing the Debtors to Retain and Compensate Certain Professionals Utilized in the Ordinary Course of Business*, ECF No. 102 (as may be amended from time to time, the “Ordinary Course Professionals Order”).

2. The Firm may have performed services in the past, may currently perform services, and may perform services in the future in matters unrelated to the Chapter 11 Cases for persons that are parties in interest in the Chapter 11 Cases. The Firm does not perform services

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

for any such person in connection with the Chapter 11 Cases, or have any relationship with any such person, their attorneys or their accountants that would be adverse to the Debtors or their estates.

3. The Debtors have requested that the Firm provide advice and assistance concerning certain matters of Bermuda law to the Debtors, and the Firm has consented to provide such services.

4. The Firm has not provided services to the Debtors prior to the commencement of the Chapter 11 Cases.

5. The Firm does keep, in the ordinary course of business, time records in one-tenth-of-an-hour increments.

6. As part of its customary practice, the Firm is retained in cases, proceedings and transactions involving many different parties, some of whom may represent or be employed by the Debtors, claimants and parties in interest in the Chapter 11 Cases.

7. Neither I nor any principal, partner, director, or officer of or professional employed by, the Firm, has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principal and regular employees of the Firm.

8. Neither I nor any principal, partner, director, or officer of or professional employed by, the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates with respect to the matter(s) upon which the Firm is to be employed.

9. The Debtors do not owe any amount in either U.S. Dollars or any other currency on the Petition Date for prepetition services or otherwise.

10. As of the Petition Date, the Firm was not party to an agreement for indemnification with the Debtors.

11. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of such inquiries, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

*[Signature page follows]*

I declare under penalty of perjury under the laws of the United States of America  
that the foregoing is true and correct.

Dated: 10 July, 2023



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Michael Goulborn  
Senior Associate  
MJM Limited

Address: Thistle House, 4 Burnaby Street,  
Hamilton HM 11, Bermuda  
Telephone: +1 (441) 294-3641  
Facsimile: +1(441) 292-2277  
Email: [mgoulborn@mjm.bm](mailto:mgoulborn@mjm.bm)

**EXHIBIT B**  
**OCP Questionnaire**



Genesis Global Holdco, LLC, *et al.*  
Chapter 11 Lead Case No 23-10063 (SHL)

RETENTION QUESTIONNAIRE

TO BE COMPLETED BY PROFESSIONALS EMPLOYED BY GENESIS GLOBAL  
HOLDCO LLC, *et al.*, (the “Debtors”)

THIS QUESTIONNAIRE WILL BE FILED WITH THE COURT ON YOUR BEHALF.  
PLEASE REMIT IT TO THE FOLLOWING ADDRESS:

CLEARY GOTTlieb STEEN & HAMILTON LLP

One Liberty Plaza

New York, New York 10006

If more space is needed, please complete on a separate page and attach.

1. Name and address of the firm:

MJM Limited

Thistle House

4 Burnaby Street

Hamilton HM 11

Bermuda

2. Date of retention: 20 June 2023

3. Type of services provided:

Legal advice concerning certain matters of Bermuda law.

4. Brief description of services to be provided:

Legal advice and assistance

regarding certain Bermuda law matters.

5. Arrangements for compensation (hourly, contingent, etc.):

Hourly

(a) Average hourly rate (if applicable): \$300-800

(b) Estimated average monthly compensation (based on prepetition retention if firm was employed prepetition):

N/a

6. Prepetition claims against any of the Debtors held by the firm:

Debtor(s) against whom claim is held: N/a

Amount of claim:

Date claim arose:

Source of claim:

7. Prepetition claims against the Debtors held individually by any member or associate of the firm:

Name: N/a

Status:

Debtor(s) against whom claim is held:

Amount of claim:

Date claim arose:

Source of claim:

8. Stock or American Depositary Shares of any of the Debtors currently held by the firm:

Kind of shares: N/a

No. of shares: \_\_\_\_\_

9. Stock or American Depositary Shares of any of the Debtors currently held individually by any member or associate of the firm:

Name: N/a

Status: \_\_\_\_\_

10. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates with respect to the matters on which the above-named firm is to be employed.

N/a  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Name: Michael Goulborn

Title: Senior Associate